

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JENNIFER CONIDI, individually and on)
behalf of all others similarly situated,)

Plaintiff,)

vs.)

FURRER INC d/b/a CLICLIME.COM)
and DOES 1-10)

Defendants)
)
)
_____)

Case No.: 1:23-cv-02185

Honorable Judge Edmond E. Chang

**FURRER INC d/b/a CLICLIME.COM’S MOTION TO DISMISS PLAINTIFF’S
COMPLAINT UNDER FED. R. CIV. PROC. 12(B)(2) AND 12(B)(6)**

Defendant, Furrer Inc. d/b/a Cliclime.com (“Furrer Inc.”), by its undersigned counsel, respectfully moves this Court for an Order dismissing the Complaint of Plaintiff, Jennifer Conidi (“Plaintiff”) with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(2), for lack of personal jurisdiction. Further, Plaintiff moves to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6), on the ground that Plaintiff has failed to state a claim upon which relief may be granted against Furrer Inc. The base for Furrer Inc.s’ Motion are set forth in the accompanying Memorandum.

WHEREFORE, Furrer Inc. respectfully requests that the Court grant its Rule 12(b)(2) and 12(b)(6) motion with respect to Plaintiff’s Complaint in its entirety.

Dated: May 2, 2023

Respectfully submitted,
Galanis, Pollack, Jacobs & Johnson, SC

By Electronically signed by Joshua J. Brady
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on this 2nd day of May, 2023, on the following counsel of record via the Court's electronic filing system (CM/ECF):

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